

DAVID CHIU, State Bar # 189542
City Attorney
YVONNE R. MERE, State Bar # 173594
Chief Deputy City Attorney
SARA J. EISENBERG, State Bar # 269303
Chief of Complex & Affirmative Litigation
OWEN J. CLEMENTS, State Bar # 141805
JAIME M. HULING DELAYE, State Bar
270784
Deputy City Attorneys
Fox Plaza
1390 Market Street, Sixth Floor
San Francisco, CA 94102
Telephone: (415) 554-3597
jaime.hulingdelaye@sfcityatty.org

Attorneys for Plaintiff
[Additional counsel appear on signature
page.]

Padraic Foran (SBN 268278)
Marshall A. Camp (SBN 231389)
Moez M. Kaba (SBN 257456)
Michael K. Acquah (SBN 313955)
pforan@hueston.com
mcamp@hueston.com
mkaba@hueston.com
macquah@hueston.com
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340

John C. Hueston (SBN 164921)
Michael M. Purpura (SBN 338216)
jhueston@hueston.com
mpurpura@hueston.com
HUESTON HENNIGAN LLP
620 Newport Center Dr., Suite 1300
Newport Beach, CA 92660
Telephone: (949) 229-8640

Attorneys for Defendants Endo
Pharmaceuticals Inc., Endo Health
Solutions Inc., Par Pharmaceutical, Inc.,
and Par Pharmaceutical Companies,
Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE CITY AND COUNTY OF SAN
FRANCISCO, CALIFORNIA and THE
PEOPLE OF THE STATE OF
CALIFORNIA, Acting by and through San
Francisco City Attorney DAVID CHIU,

Plaintiffs,

v.

PURDUE PHARMA L.P., et al.

Defendants.

Case No. 3:18-cv-7591-CRB

STIPULATION AND ~~PROPOSED~~
ORDER RE: SEVERANCE

1 **WHEREAS**, Plaintiff and the Endo and Par Defendants¹ (the “Settling Parties”)
 2 have reached an agreement in principle to settle Plaintiff’s claims that is subject to
 3 documentation and requisite approvals by the City and County of San Francisco.

4 **THE SETTling PARTIES THEREFORE STIPULATE, AGREE, AND**
 5 **REQUEST**, through their respective counsel of record, the Court to **ORDER**, that the
 6 Settling Parties’ claims and defenses with respect to the Endo and Par Defendants be
 7 severed from the forthcoming trial.

8
 9 April 20, 2022

Respectfully submitted,

10 /s/ Padraic Foran

11 Padraic Foran (SBN 268278)
 12 Marshall A. Camp (SBN 231389)
 13 Moez M. Kaba (SBN 257456)
 14 Michael K. Acquah (SBN 313955)
 15 pforan@hueston.com
 16 mcamp@hueston
 17 mkaba@hueston.com
 18 macquah@hueston.com
 19 HUESTON HENNIGAN LLP
 20 523 West 6th Street, Suite 400
 21 Los Angeles, CA 90014
 22 Telephone: (213) 788-4340
 23 Facsimile: (888) 775-0898

/s/ Elizabeth J. Cabraser

LIEFF, CABRASER, HEIMANN
 & BERNSTEIN, LLP
 Elizabeth J. Cabraser
 Richard M. Heimann
 Kevin R. Budner
 Michael Levin-Gesundheit
 Mark P. Chalos
 Jacob H. Polin
 Miriam E. Marks
 275 Battery Street, 29th Floor
 San Francisco, CA 94111-3339
 Telephone: (415) 956-1000
 Facsimile: (415) 956-1008

18 John C. Hueston (SBN 164921)
 19 Michael M. Purpura (SBN 338216)
 20 jhueston@hueston.com
 21 mpurpura@hueston.com
 22 HUESTON HENNIGAN LLP
 23 620 Newport Center Dr., Suite 1300
 24 Newport Beach, CA 92660
 25 Telephone: (949) 229-8640

26 *Attorneys for Defendants Endo*
 27 *Pharmaceuticals Inc., Endo Health*
 28 *Solutions Inc., Par Pharmaceutical,*
Inc., and Par Pharmaceutical
Companies, Inc.

David Chiu
 CITY ATTORNEY
 Yvonne R. Mere
 Sara J. Eisenberg
 Owen J. Clements
 Jaime M. Huling Delaye
 John H. George
 DEPUTY CITY ATTORNEYS
 Fox Plaza
 1390 Market Street, Sixth Floor
 San Francisco, CA 94102
 Telephone: (415) 554-3957
 jaime.hulingdelaye@sfcityatty.org

¹ The Endo and Par Defendants are Endo Pharmaceuticals Inc., Endo Health Solutions Inc., Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc.

/s/ Aelish M. Baig

ROBBINS GELLER RUDMAN
& DOWD LLP
Aelish M. Baig
Taeva C. Shefler
Hadiya K. Deshmukh
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: (415) 288-4545
Facsimile: (415) 288-4534
aelishb@rgrdlaw.com
tshefler@rgrdlaw.com
hdeshmukh@rgrdlaw.com

Paul J. Geller
Mark J. Dearman
Dorothy P. Antullis
Nicolle B. Brito
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: (561) 750-3000
Facsimile: (561) 750-3364
pgeller@rgrdlaw.com
mdearman@rgrdlaw.com
dantullis@rgrdlaw.com
nbrito@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
X. Jay Alvarez
Thomas E. Egler
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 231-1058
Facsimile: (619) 231-7423
jaya@rgrdlaw.com
tome@rgrdlaw.com

RENNE PUBLIC LAW GROUP
Louise Renne
350 Sansome Street, Suite 300
San Francisco, CA 94104
Telephone: (415) 848-7240
Facsimile: (415) 848-7230
lrenne@publiclawgroup.com

1 ANDRUS ANDERSON LLP
2 Jennie Lee Anderson
3 Audrey Siegel
4 155 Montgomery Street, Suite 900
5 San Francisco, CA 94104
6 Telephone: (415) 986-1400
7 Facsimile: (415) 986-1474
8 jennie@andrusanderson.com
9 audrey.siegel@andrusanderson.com

6 SANFORD HEISLER SHARP, LLP
7 Kevin Sharp
8 611 Commerce Street, Suite 3100
9 Nashville, TN 37203
10 Telephone: (615) 434-7000
11 Facsimile: (615) 434-7020
12 ksharp@sanfordheisler.com

10 SANFORD HEISLER SHARP, LLP
11 Edward Chapin
12 655 West Broadway, Suite 1700
13 San Diego, CA 92101
14 Telephone: (619) 577-4253
15 Facsimile: (619) 577-4250
16 echapin2@sanfordheisler.com

14 CASEY GERRY SCHENK FRANCAVILLA
15 BLATT & PENFIELD LLP
16 David S. Casey, JR.
17 Gayle M. Blatt
18 Alyssa Williams
19 110 Laurel Street
20 San Diego, CA 92101-1486
21 Telephone: (619) 238-1811
22 Facsimile: (619) 544-9232
23 dcasey@cglaw.com
24 gmb@cglaw.com
25 awilliams@cglaw.com

21 WEITZ & LUXENBERG P.C.
22 ELLEN RELKIN
23 700 Broadway
24 New York, NY 10003
25 Telephone: (212) 558-5500
26 Facsimile: (212) 344-5461
27 erelkin@weitzlux.com

25 WEITZ & LUXENBERG P.C.
26 Melinda Davis Nokes
27 1880 Century Park East
28 Los Angeles, CA 90067
Telephone: (310) 247-0921
Facsimile: (310) 786-9927
mnokes@weitzlux.com

WEITZ & LUXENBERG P.C.
Paul F. Novak
Tiffany R. Ellis
3011 W. Grand Blvd, 24th Floor
Detroit, MI 48202
Telephone: (313) 800-4170
Facsimile: (646) 293-7960
pnovak@weitzlux.com
tellis@weitzlux.com

Attorneys for Plaintiff

ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the above signatories.

DATED: April 20, 2022

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: April 21, 2022



THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE